Dear FCC:

All ionosphere propagated amateur bands, with the exception of 160m, have a digital specific subband.

The lack of a subband on 160 meters means that voice wide band mode can set up house keeping anywhere they like and this is often at the expense of narrow band modes that are operating under minimum signal to noise conditions akin to moon bounce and communicating over thousands of miles. I have often asked W5TZ and others, that were taking up many digital slots with their wide band local chatter on 1.823 mhz to please move higher in frequency because they were on top of a foreign narrow band station.

Their reply was that reference fcc 160 meter band rules they can operate antwhere they like and intend to do just that.

160 meters is a large band and it is no hardship on the local voice rag chewers to be assigned between 1.843 to 2.000 mhz with digital, including cw, between 1.800 and 1.843 mhz.

Every digital operator I talk to is in agreement and this includes my neighbors that operate 160 meter digital and voice, KH6CC Jack Wheeler and N6KB, Ken Brown. In fact all 160 meter voice only operators that I have talked to are in agreement with the ARRL bandplan (voice above 1.843 mhz) with the exception of the few that enjoy preventing the digital types from communicating.

Sincerely yours, Bryce A. Carr, KH6AT